

From: [Moore, Gary](#)
To: [Chrishelle Palay](#)
Bcc: [Terry Andrews](#)
Subject: Re: CES Site Update
Date: Monday, September 15, 2014 8:05:29 PM

Chrishelle:

The EPA and its contractors have been on-site M-F since August 26 sampling the various containers and sending the majority of the samples off to an analytical lab to determine the chemicals for disposal. The laboratory is having difficulty with some of the samples do to the oily matrix and therefore have been unable to meet the requested turnaround times.

Removal Activities: The general removal process for the CES waste disposal will involve:

1. Sampling containers for compound identification for disposal;
2. Evaluate the data to determine the appropriate disposal options;
3. Get bids for disposal and determine the disposal facility;
4. Conduct on-site process of the waste and/or transfer waste into shippable containers;
5. Schedule the disposal into the facility;
6. Ship waste off for disposal;

Remedial Activities: (I am not an expert on this process but generally looks like this)

1. Superfund Preliminary Assessment (PA): TCEQ will begin this action on or about September 18 and anticipated to be completed in November.
2. Superfund Site Inspection/Expanded Site Inspection (SI/ESI): This will be done upon conclusion of the PA with a determination by EPA/TCEQ to continue such work which I believe is a given (Sampling for NPL Ranking Purposes);
3. NPL/Superfund Ranking Package: If determined necessary to go forward after the PA/SI/ESI this will be done to see if the site meets the criteria to be ranked on either the State Superfund or Federal Superfund List;
4. Proposal to State or Federal Superfund List: I am not sure the process for State Superfund but for Federal Superfund it would be proposed by EPA rule making if determined appropriate based upon the previous information;
5. Final on NPL: Placed on the NPL;
6. Remedial Investigation/Feasibility Study: The on-site and off-site areas will be thoroughly sampled to determine extent of contamination and human health risk along with feasibility study to determine remedial action options;
7. Remedial Design: Determine the specific action and how they will be done during the remedial action;
- 8; Remedial Action: Remedial cleanup action conducted.

* The Removal Program could be asked to take additional actions on the site if the site is Proposed to the NPL.

Answers to Your Questions:

1. Have any clean up activities commenced since our meeting (8/21/14)?

Yes, sampling of containers have been conducted. We are currently evaluating data and determining disposal options. Expect waste to begin to be disposed maybe by the end of this week or next week. Expect the process to be slow as we are still identifying appropriate disposal facilities.

2. Have the test results returned from the waste that was brought in from CES's Port Arthur location? If so, what were the results? If not, when will they be in?

Yes, we are getting some of the results for the two vacuum boxes (orange boxes). There were alot of chemical compounds detected in these two boxes.

Vacuum Box: 25141

Totals Detections: Acetone, Benzene, sec-Butylbenzene, Chloroform, Carbon disulfide, Ethylbenzene, Isopropylbenzene, p-Isopropyltoluene, Methyl ethyl ketone, Naphthalene, n-Propylbenzene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Toluene, Xylene (total), m,p-Xylene, o-Xylene, 2-Chlorophenol, 2,4-Dichlorophenol, 2,4-Dimethylphenol, 2-Methylphenol, 3&4-Methylphenol, Phenol, 2,4,6-Trichlorophenol, 1-Methylnaphthalene, 2-Methylnaphthalene, Naphthalene, TPH (C6-C12), TPH (>C12-C28), TPH (>C28-C35), TPH (C6-C35), Aluminum, Antimony, Arsenic, Barium, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Nickel, Potassium, Silver, Sodium, Vanadium, Zinc
TCLP Hazardous: 2-Methylphenol, 3&4-Methylphenol, Phenol,
Vacuum Box: 281842 (aka 2567) Totals (Detections): Acetone, Benzene, sec-Butylbenzene, Chloroform, Carbon disulfide, Ethylbenzene, Isopropylbenzene, p-Isopropyltoluene, Methyl ethyl ketone, Naphthalene, n-Propylbenzene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Toluene, Xylene (total), m,p-Xylene, o-Xylene, 2,4-Dimethylphenol, 2-Methylphenol, 3&4-Methylphenol, Phenol, 2,4,6-Trichlorophenol, 1-Methylnaphthalene, 2-Methylnaphthalene, Naphthalene, TPH (C6-C12), TPH (>C12-C28), TPH (>C28-C35), TPH (C6-C35), Aluminum, Antimony, Arsenic, Barium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Nickel, Potassium, Selenium, Silver, Sodium, Vanadium, Zinc
TCLP (Hazardous): 2-Methylphenol, Phenol

2. Has the City moved forward with supplying water to the site?

Yes, the city indicated today that they will assist with providing water for our use.

3. How has EPA addressed security concerns on the site? Has HPD been involved in securing the site?

The fencing around the facility has been substantially repaired. We will be getting temporary fencing and will be blocking off Wayland Street . At the present, temporary roadblocks are in place. The City will provide added police drive-bys to assist. We have no plans of hiring security at this time.

4. Has there been any movement on getting the site placed on the State Superfund list? Getting the site placed on the Superfund list is a process which is outlined above. TCEQ will be out this week to begin the Preliminary Assessment Phase.

5. Do you know the status of a developer acquiring the site and fully remediating it?

No, there have been several people that have come out that are interested in the property. They are working with the Trustee and the Realtor. EPA is not really involved in this activity except for providing access to the site for view of potential purchasers.

6. Have the various materials onsite and in the community been sampled and/or sent to the lab?

A substantial portion of the materials on-site have been sampled with some be sent to a lab for analysis. The only community sampling that has been done at the present are those that were done in conjunction with the spill at the end of July/beginning of August. Nothing that appears to be an immediate risk to Human Health but it will be evaluated by health professionals and toxicologists.

7. Have bids for disposal already been sent and/or received?

The lab data must be received and evaluated before this can be substantially done but we are in the process of bidding out one of the Frac Tanks and will soon be bidding out the Vacuum Boxes. We are moving forward.

I hope this helps.

Thanks

Gary Moore

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From: Chrishelle Palay
Sent: Monday, September 15, 2014 12:16 PM
To: Moore, Gary
Cc: Henneberger John
Subject: CES Site Update

Gary,

It's been some weeks since we met you at the CES site and I just wanted to follow up regarding the status of some of the issues that we discussed. We remain concerned about the health concerns of the community and are anxious to see the facility and community cleaned up as soon as possible. We know that it's a process, but would like to get a good idea of the status of the process so that we can keep the community informed.

- Have any clean up activities commenced since our meeting (8/21/14)?
- Have the test results returned from the waste that was brought in from CES's Port Arthur location? If so, what were the results? If not, when will they be in?
- What is the status of the water TCEQ sucked into containers from the storm water drainage? Has it been shipped off for disposal?
- Has the City moved forward with supplying water to the site?
- How has EPA addressed security concerns on the site? Has HPD been involved in securing the site?
- Has there been any movement on getting the site placed on the State Superfund list?
- Do you know the status of a developer acquiring the site and fully remediating it?
- Have the various materials onsite and in the community been sampled and/or sent to the lab?
- Have bids for disposal already been sent and/or received?

Any information that you can provide regarding these concerns would be greatly appreciated. Feel free to call if you have other questions or concerns.

Thank you,

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